



STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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March 5, 2002

Mr. Greg Hanon
Communico Governmental Affairs
C/O Ad Hoc Metals Coalition
Evergreen Plaza Building
711 Capitol Way South
Olympia, WA 98501

Dear Mr. Hanon:

The purpose of this letter is to respond to your request regarding the Environmental Protection Agency's (EPA) review of selected metals and Ecology's evaluation of that process for its "PBT Working List". Ecology's Persistent, Bioaccumulative Toxins (PBT) Working List serves as an agency reference for which PBTs we should focus on for future chemical action plans, and for the baseline monitoring program design. Ecology relied on a "PBT Characteristics" score developed by EPA to determine which chemicals to evaluate as the PBT Working List was developed.

Recently, it has come to our attention that EPA is in the process of updating their agency's waste minimization priorities as mandated by the Government Performance and Results Act. It is expected that an updated list of the highest priority PBTs slated for waste minimization priorities will be released later in Spring 2002. Included in these waste minimization priorities will be those metals that occur most frequently in RCRA waste streams or are part of international PBT reduction efforts. Ecology has learned that EPA will be working with its Science Advisory Board to develop comprehensive cross-agency guidance for assessing the hazards and risks of metals. Until this issue posed to EPA's Science Advisory Board is addressed, Ecology will include a footnote on any PBT Working List identifying that any metals on the working list are currently undergoing this review and that Ecology will revise any PBT working list so as to be consistent with EPA waste minimization treatment of metals.

The purpose of the PBT working list is to update and inform the public, regulated community, and other interested parties which PBTs are found in Washington. The PBT Working List will be updated periodically during the next several years as more data collected from Washington's environment becomes available and if EPA determines the need to refine, based on any new information, any "PBT characteristics" scores. In the past, Ecology has made it clear that we




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intend to model closely EPA's process to ensure state consistency with nationally applied criteria and priorities.

If you have any further questions, please contact Mike Gallagher, Ecology's PBT Coordinator at 360/407-6868.

Sincerely,



Tom Fitzsimmons
Director

CC: Bill Backous, Program Manager - Environmental Assessment Program
Mike Gallagher, Ecology PBT Coordinator - Environmental Assessment Program
Greg Sorlie, Program Manager - Hazardous Waste and Toxics Reduction Program
Tom Eaton, Director - EPA Washington Operations Office